

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

CAROLYN GREENE, on behalf herself  
and all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS  
A. MOORE, CARL W. RAUSCH and  
RONALD F. RICHARDS,  
Defendants.

Civil Action No. 03-CV-12628

JOHN G. ESPOSITO, JR., D.D.S., on  
behalf himself and all others similarly  
situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS  
A. MOORE, CARL W. RAUSCH and  
RONALD F. RICHARDS,  
Defendants.

Civil Action No. 04-CV-10013

JOSEPH L. KING, on behalf of himself  
and all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS  
A. MOORE, CARL W. RAUSCH and  
RONALD F. RICHARDS,  
Defendants.

Civil Action No. 04-CV-10038

**[Additional Captions Follow on Next Page]**

Michael E. CRIDEN, on behalf himself  
and all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS  
A. MOORE, CARL W. RAUSCH and  
RONALD F. RICHARDS,  
Defendants.

Civil Action No. 04-CV-10046

ISRAEL SHURKIN and SHARON  
SHURKIN on behalf themselves and all  
others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS  
A. MOORE, CARL W. RAUSCH and  
RONALD F. RICHARDS,  
Defendants.

Civil Action No. 04-CV-10055

JAMES J. NIZZO and VIRGINIA C.  
NIZZO, as JOINT TENANTS and CARLO  
CILIBERTI, on behalf of themselves and  
all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS  
A. MOORE, CARL W. RAUSCH and  
RONALD F. RICHARDS,  
Defendants.

Civil Action No. 04-CV-10065

**[Additional Captions Follow on Next Page]**

BARRY BROOKS, on behalf himself and  
all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS  
A. MOORE, CARL W. RAUSCH and  
RONALD F. RICHARDS,  
Defendants.

Civil Action No. 04-CV-10077

ANASTASIOS PERLEGIS, on behalf  
himself and all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS  
A. MOORE, CARL W. RAUSCH and  
RONALD F. RICHARDS,  
Defendants.

Civil Action No. 04-CV-10078

MARTIN WEBER, on behalf of himself  
and all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS  
A. MOORE, CARL W. RAUSCH and  
RONALD F. RICHARDS,  
Defendants.

Civil Action No. 04-CV-10090

**[Additional Captions Follow on Next Page]**

BRUCE HAIMS, on behalf himself and all  
others similarly situated,

Plaintiff,

Civil Action No. 04-10144

v.

BIOPURE CORPORATION, THOMAS  
A. MOORE, CARL W. RAUSCH and  
RONALD F. RICHARDS,  
Defendants.

MODEL PARTNERS LIMITED, on behalf  
themselves and all others similarly situated,

Plaintiff,

Civil Action No. 04-CV-10155

v.

BIOPURE CORPORATION, THOMAS  
A. MOORE, CARL W. RAUSCH and  
RONALD F. RICHARDS,  
Defendants.

JUNE E. PATENAUDE, on behalf of  
herself and all others similarly situated,

Plaintiff,

Civil Action No. 04-CV-10179

v.

BIOPURE CORPORATION, THOMAS  
A. MOORE, CARL W. RAUSCH and  
RONALD F. RICHARDS,  
Defendants.

**[Additional Captions Follow on Next Page]**

NANCY L. PINCKNEY and GERTRUDE  
PINCKNEY, on behalf themselves and all  
others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS  
A. MOORE, CARL W. RAUSCH and  
RONALD F. RICHARDS,  
Defendants.

Civil Action No. 04-CV-10189

W. KENNETH JOHNSON, on behalf  
himself and all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS  
A. MOORE, CARL W. RAUSCH and  
RONALD F. RICHARDS,  
Defendants.

Civil Action No. 04-CV-10190

GREGORY KRUSZKA, on behalf of  
himself and all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS  
A. MOORE, CARL W. RAUSCH and  
RONALD F. RICHARDS,  
Defendants.

Civil Action No. 04-CV-10202

**NOTICE OF WITHDRAWAL OF MOTION**

George Eliopoulos, Dale Self and Mark Mentz, by their counsel, hereby withdraw their  
motion for appointment as lead plaintiff, filed with this Court on March 1, 2004. This

withdrawal is without prejudice to Messieurs Eliopoulos's, Self's and Mentz's claims and rights as a member of the proposed class, including the right to share in any recovery or settlement of these actions. It is also conditioned on this Court appointing one or more lead plaintiff[s] from among the individuals that filed lead plaintiff applications on March 1, 2004.

Dated: March 17, 2004

Respectfully submitted,

**BERMAN DEVALERIO PEASE  
TABACCO BURT & PUCILLO**

/s/ Patrick T. Egan

Jeffrey C. Block

Patrick T. Egan

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Eliopoulos, Dale Self and Mark Mentz**